

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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In re:	:
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	: PROMESA : Title III
as representative of	: Case No. 17-BK-3283 (LTS)
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,	: (Jointly Administered)
Debtors. ¹	:
	X
In re:	:
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	: PROMESA : Title III
as representative of	: Case No. 17-BK-4780 (LTS)
PUERTO RICO ELECTRIC POWER AUTHORITY,	:
Debtor.	:
	X

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS'
RESERVATION OF RIGHTS REGARDING PRELIMINARY FACT WITNESS LIST
RELATED TO PREPA'S TITLE III PLAN OF ADJUSTMENT**

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233 (LTS)) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Judge Laura Taylor Swain:

In accordance with the *Amended and Restated Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* [Docket No. 3305] (the “Confirmation Procedures Order”),² the Official Committee of Unsecured Creditors (the “Committee”), by its counsel, hereby makes the following reservation of rights regarding the preliminary list of fact witnesses in connection with the *Modified Second Amended Title III Plan of Adjustment of the Puerto Rico Electric Power Authority* [Docket No. 3296] (the “Plan”).

1. The Committee reserves the right to call any of the witnesses identified by the Oversight Board (including the witnesses identified on the *Debtor’s Preliminary List of Witnesses to Be Offered in Support of Confirmation of Plan of Adjustment* [Docket No. 3329]) or any other party (including the witnesses identified on *Preliminary Fact Witness List of the Ad Hoc Group of PREPA Bondholders, Assured Guaranty Corp., Assured Guaranty Municipal Corp., Syncora Guarantee, Inc., and U.S. Bank National Association as PREPA Bond Trustee Related to PREPA’s Title III Plan of Adjustment* [Docket No. 3395]), including as to the topics identified by the Oversight Board and such other parties.

2. The Committee reserves the right to call any witnesses to testify, if needed, to authenticate documents the Committee may offer in evidence in connection with the Confirmation Hearing.

3. The Committee reserves the right to call any witness who provides deposition testimony in connection with confirmation of the Plan.

² Capitalized terms used but not otherwise defined herein have the meanings set forth in the Confirmation Procedures Order.

4. The Committee reserves the right to amend the preliminary list of fact witnesses as planning for the Confirmation Hearing proceeds and to (a) add or remove witnesses and (b) modify the topics about which witnesses may testify.

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Dated: April 14, 2023
New York, New York

/s/ Luc A. Despins

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- and -

/s/ Juan J. Casillas Ayala

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